D. teomani)



Serving all of your community banking needs

2005 SEP 26 API 10 29

September 8, 2005

FDIC – San Francisco Regional Office Regional Director John F. Carter 25 Jessie Street at Ecker Square, Suite 2300 San Francisco, CA 94105

Dear Mr. Carter:

I would like to strongly express my opposition to Wal-Marts application for deposit insurance. I have worked in small community banks in Wisconsin and Minnesota for my entire 30-year career. In this time, the banking industry has faced many challenges. I can remember early in my banking career as regulation Q was deregulated, many bankers thought that the end of community banking wouldn't be far away. Community bankers faced that issue and a host of regulation changes since. This new threat of a mega retail giant like Wal-Mart requesting FDIC insurance, appears daunting and more real than other challenges we have faced.

There has always been tough competition from the quasi government agencies that have competed in the agricultural market place and with larger regional banks for all banking services. Community banks have remained strong and viable over the years, facing challenges head on.

The Wal-Mart application for FDIC insurance is frightening to me as I look at what new Wal-Marts in various communities have done to many local small businesses. My Bank, located in Southern Minnesota, has Wal-Mart stores located 15 miles to the north, 12 miles to the south and 40 miles to the West. The mixing of banking and commerce has always been regarded as bad public policy. This opposition was recently reaffirmed when congress passed the Gramm-Leach-Bliley Act.

Thank you for taking time to consider the position of the thousands of community banks throughout this great country.

Respectfully,

Garry R. Gordinier,

Executive Vice President & CEO

101 Central Avenue South Geneva, MN 56035

OFFICE: 507/256.7235 FAX: 507/256.4476 www.commercebankmn.com